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7

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 KATHERINE MAYORGA, an individual )  
11 ) 2:19-cv-00168-JAD-DJA  
Plaintiff, )  
12 vs. )  
13 )  
CRISTIANO RONALDO, individually, )  
14 Does i-XX and Roe Corporations I-XX; )  
Defendants. )  
15

16 STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF'S FILING OF  
17 OPPOSITION AND REPLIES TO DEFENDANT CRISTIANO RONALDO'S MOTION TO  
18 COMPEL ARBITRATION AND STAY PROCEEDINGS

19 First (Amended ) Request

20 The parties through their respective counsel hereby stipulate to extend the time for filing  
21 of Plaintiff's Opposition to Defendant Cristiano Ronaldo's Motion to Compel Arbitration and  
22 Stay Proceedings, from August 22, 2019 to September 20, 2019 and the filing of the  
23 Defendant's Reply to the Plaintiff's Opposition to October 11, 2019. This is the first (amended)  
24 request for an extension of time to file an Opposition to Defendant Cristiano Ronaldo's Motion  
25 to Compel Arbitration and Stay Proceedings.  
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27 Defendant's Motion to Compel Arbitration and Stay Proceedings (ECF 26) was filed on  
28 August 8, 2019, with the deadline for Plaintiff's Opposition being August 22, 2019. On August

1 22, 2019 the parties submitted their Stipulation and Order to Stay Discovery and Continue  
2 Briefing Schedule (ECF 35). The court rejected that Stipulation on August 26, 2019 (ECF 36)  
3 and requested additional information regarding the reasons for the stipulation to extend time.  
4

5 Good cause exists to set an extended briefing schedule regarding Defendant's Motions.  
6 Plaintiff has requested additional time to respond to both of Defendant's Motions as a result of  
7 her counsel's current caseload and other family related scheduling issues.

8 In particular, Plaintiff's counsel concluded a four-week jury trial in *Peterson v. Medic*  
9 *West Ambulance Inc.* in Department 14 of the Clark County District Court on August 2, 2019;  
10 commenced preparation for the September 9, 2019 homicide trial of *State v. Billingsley*, in  
11 Department 11 of the Clark County District Court; and filed motions so continue trials set to  
12 commence on September 9, 2019 in cases of *Endeavor v. Carlos and Charlie's* in Department 15  
13 of the Clark County District Court and *Gaspar v. Rohi* in Department 18 of the Clark County  
14 District Court.  
15

16 Additionally, Plaintiff's counsel was informed that his sister was admitted to a hospital  
17 on August 9, 2019, traveled to the state of Florida to care for his sister following her discharge,  
18 and returned to his office on August 19, 2019. On September 3, 2019 the *Endeavor v. Carlos and*  
19 *Charlie's* trial was continued to September 23, 2019 to provide plaintiff's counsel time to  
20 complete the response to Defendant's Motion to Compel Arbitration and Stay Proceedings in this  
21 case. On September 4, 2019 the *Rohi v. Gaspar* parties settled and the trial of the third-party  
22 complaint was continued to February 10, 2019. On September 5, 2019 the *State v. Billingsley*  
23 case was continued to March 2, 2019. Thus, due to the aforementioned personal and  
24 professional scheduling conflicts, Plaintiff requires until September 20, 2019 to oppose  
25 Defendant's Motion to Compel Arbitration and Stay Proceedings.  
26  
27  
28

1 Defendant will in turn require additional time to prepare a Reply brief in support of  
2 Defendant's Motion to Compel Arbitration and Stay Proceedings. Defendant has also agreed to  
3 afford Plaintiff until September 20, 2019 to file her Opposition to Defendant's Motion to  
4 Dismiss, which would initially have been due on August 30, 2019 but under the new briefing  
5 schedule, will now be filed on the same date as the instant Opposition to Defendant's Motion to  
6 Compel Arbitration and Stay Proceedings, versus the staggered deadlines that would have been  
7 in place based on the date of the initial filings. Additionally, because the Parties could not agree  
8 on language to set-forth an agreement to stay discovery in this matter, Defendant's Counsel will  
9 also be required to file a motion to stay discovery in the coming weeks. Accordingly, good  
10 cause exists to extend the briefing deadlines for both Parties as follows:

- 13 • September 20, 2019: Deadline for Plaintiff's Oppositions to Defendant's Motion  
14 to Compel Arbitration and Motion to Dismiss.
- 15 • October 11, 2019: Deadline for Defendant's Reply briefs in support of  
16 Defendant's Motion to Compel Arbitration and Motion to Dismiss.

17 Dated this 16, September, 2019

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19 \_\_\_\_\_  
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27 Dated this \_\_\_, September, 2019

28 /s/ Kendelee Leascher  
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2 (702) 570-9262

IT IS SO ORDERED.

3 DATED: September 9, 2019

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5 \_\_\_\_\_  
6 United States Magistrate Judge

7 DATED this 4, day of September, 2019  
8 STOVALL & ASSOCIATES

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